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12 Attorneys for Defendant  
13 PIXAR

14 UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA

16 IN RE HIGH-TECH EMPLOYEE  
17 ANTITRUST LITIGATION

18 THIS DOCUMENT RELATES TO:  
19 ALL ACTIONS

Case No.: C 11-CV-2509-LHK

**DECLARATION OF JAMES M.  
KENNEDY ON BEHALF OF  
PIXAR PURSUANT TO COURT'S  
APRIL 15, 2013 ORDER (DKT. 402)**

Courtroom: 8, 4<sup>th</sup> Floor  
Judge: Hon. Lucy H. Koh

Date Consol. Amended Compl. Filed:  
September 13, 2011

**Trial Date: May 27, 2014**

**DECLARATION OF JAMES M. KENNEDY**

I, James M. Kennedy, declare as follows:

1. I am the Senior Vice President, Business Strategy and Chief Legal Counsel for Pixar, and I am an attorney licensed to practice law in the State of California. The matters set forth herein are true and correct of my own personal knowledge and information provided to me. If called as a witness, I could and would testify competently thereto.

2. I submit this declaration in response to the Court's April 15, 2013 Order directing in-house counsel for each Defendant in this case to file a sworn declaration confirming the production of all compensation materials responsive to Plaintiffs' Request for Production of Documents ("RFPs"). (Dkt. 402.)

3. I have been the Pixar in-house attorney with primary responsibility for overseeing Pixar's document collection in this case, including the collection of documents responsive to document requests related to Pixar's compensation of employees. In that capacity, I have worked with Pixar's employees, outside counsel, and e-discovery support providers to search for, collect, and produce Pixar documents responsive to Plaintiffs' RFPs, as limited by agreement of the parties.

4. Pixar has conducted a diligent search for documents responsive to Plaintiffs' RFPs as limited per agreement with counsel for plaintiffs, including with respect to custodians and search terms, and has produced non-privileged, responsive documents, including compensation materials, that it located pursuant to that search.

5. Pixar's specific discovery efforts include the following:

a. Pixar searched for, collected and produced data from its Human Resource databases that include information regarding Pixar recruiting, payroll, stock, long-term incentive, personnel, benefits and overtime.

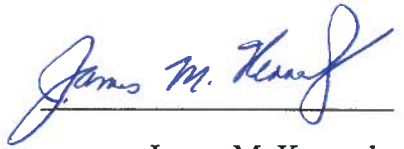
b. Pixar searched for, collected and produced policies and manuals, and high-level analyses, studies and summaries responsive to specific RFPs identified by agreement of the parties.

1 c. Pixar searched for, collected and produced electronically-stored  
2 information from the files of 31 custodians, pursuant to the parties' agreed upon search terms.

3 d. Pixar conducted follow-up targeted and electronic searches for specific  
4 documents requested by plaintiffs, including existing documents that correlate Pixar job titles  
5 with market salary survey data, and this week will complete the supplementation of its  
6 production of all non-privileged, responsive documents located pursuant to those searches.

7 I declare under penalty of perjury under the laws of the United States that the foregoing  
8 is true and correct.

9 Executed on April 25, 2013, in Emeryville, CA.

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